

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875 HON. ROBERT B. KUGLER
THIS DOCUMENT RELATES TO ALL CASES	

NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION

TO: **Jessica D. Miller, Esq,**
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
440 New York Avenue, N.W.
Washington, D.C. 20005
Attorneys for Defendants Zhejiang Huahai Pharmaceutical Co, Ltd., Huahai U.S., Inc.,
Prinston Pharmaceutical Inc., and Solco Healthcare US, LLC (hereinafter “Defendants”).

Please take notice that pursuant to Special Master Report and Order No. 56, Federal Rule of Civil Procedure 30(b)(6), and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Jucai Ge, Director of API Quality Assurance at Zhejiang Huahai Pharmaceutical Co., Ltd., on May 6 through 8, 2022, at 7:00 a.m. China standard time (May 5 through 7, 2022, at 7:00 p.m. eastern time), and continuing until completion, at a location to be designated by Defendants, via Zoom, in accordance with the Fact Witness Deposition Protocol, and Case Management Order #20, filed November 17, 2020 (Document 632). The deposition shall address the topics ordered in Special Master Report and Order No. 56 (Document 1811). The witness shall produce the documents requested at Exhibit A, attached hereto, at least five days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will be provided by Defendants.

TAKING ATTORNEY FOR PLAINTIFFS:

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The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

April 22, 2022

PLAINTIFFS' CO-LEAD COUNSEL

By: /s/Adam M. Slater
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EXHIBIT A

DOCUMENT REQUESTS

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Jucai Ge.
2. The complete production of Jucai Ge's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.
3. All documents in the possession, custody, or control of Defendants related to the deposition topics as ordered by the Court, to the extent not produced by Defendants to Plaintiffs to date.

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CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2022, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

PLAINTIFFS' CO-LEAD COUNSEL

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